

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA
FLORENCE DIVISION

JIMMIE CALLUM, JR.,

Plaintiff,

v.

SOUTH CAROLINA CVS
PHARMACY, LLC, et al.,

Defendants.

Case No. 4:14-cv-03481-BHH

DEFENDANTS' SUPPLEMENTAL LOCAL RULE 26.03 DISCLOSURES

Defendants, by and through the undersigned counsel, hereby respectfully submit the following supplemental information pursuant to Local Civil Rule 26.03, DSC:

2. Names of fact witnesses likely to be called by the party and a brief summary of their expected testimony.

ANSWER: Subject to further investigation, discovery and proceedings in this matter, Defendants believe that the following individuals may be called to testify in support of Defendants' defenses:

Name	Address	Summary of Expected Testimony
Fuller, Tracy	CVS Pharmacy Store 6410 431 Saint James Ave. Goose Creek, SC 29445 843-572-2606	Ms. Fuller is expected to testify regarding interactions with a woman believed to be Tess Pinkerton. Ms. Fuller is a supervisory employee of CVS, and should be contacted only through attorneys for Defendants.

McCrae, Sheila	CVS Pharmacy 415 Brooks Road Andrews, SC 29510	Ms. McCrae is expected to testify regarding calls made to the CVS Andrews location. Ms. McCrae is a supervisory employee of CVS, and should be contacted only through attorneys for Defendants
Medlock, Sonya	Asset Protection District Manager Rite Aid Charleston, SC 843-754-7096	Ms. Medlock is expected to testify that Rite Aid received calls in Charleston and Myrtle Beach from a male individual saying that he suffered from PTSD and would need to shop after hours.
Shelor, Sgt. Trevor	Crime Prevention Unit Supervisor Charleston Police Department 180 Lockwood Blvd. Charleston, SC 29403 843-769-7407	Sgt. Shelor is expected to testify regarding concerns of criminal activity raised by recipients of calls to Charleston area pharmacies in the latter part of 2013.
Simonetti, Tracy	District Loss Prevention Supervisor Walgreens 4000 Faber Place Drive, Suite 230 North Charleston, SC 29405 843-529-2514	Ms. Simonetti is expected to testify that Walgreens received calls in Charleston and Myrtle Beach from a male individual identifying himself as "Jimmy" wanting to know if he can shop in Walgreens stores after hours because he suffers from PTSD and does not like crowds.
Sumerlin, R.N., Grace E.	Dayton VA Medical Center 4100 W. Third Street Dayton, OH 45428 1-888-838-6446	Ms. Sumerlin is expected to testify regarding her conversations with Plaintiff on or about April 2, 2014.
Thompson, Riley	Berkeley County Sheriff's Office 223 N Live Oak Dr, Moncks Corner, SC 29461 843-719-4465	Officer Thompson is expected to testify regarding response to a 911 call at 1068 French Santee Road on or about April 2, 2014.
Westbrooks, Daphne	521 Mini Mart, 9275 Highmarket St. Georgetown, SC 29440 843-546-1855	Ms. Westbrooks is expected to testify regarding the practice of allowing customers to shop after hours in a retail location.

Respectfully submitted, this 22nd day of March, 2015

/s/ C. Pierce Campbell

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